



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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January 8, 2025

**By ECF**

Honorable Jessica G. L. Clarke  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York, 10007

Re: Saunders v. City of New York, et al.,  
24 Civ. 00910 (JGLC)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and assigned to the defense of the above referenced matter. Defendant writes jointly on behalf of the parties to respectfully request the Court to grant a sixty-day (60) extension of time to all discovery deadlines. This is the parties' second request of its kind and a proposed Revised Civil Case Management Plan and Scheduling Order has been attached as Exhibit "A". The parties sincerely apologize for this late application.

By way of background, on October 9, 2024, the parties filed a request to extend time to complete discovery. (See ECF Dkt. 15). On October 10, 2024, the Court So Ordered the proposed Revised Civil Case Management Plan and Scheduling Order. (See ECF Dkt. 16). As a result, the current deadline for the parties to complete fact discovery is January 9, 2025.

Since the last extension request, the PREA investigation into the underlying incident was completed. In mid-December, following its conclusion, the City provided the investigatory file and video relating to the incident. However, since that production, it has been determined that there was additional video footage that may be relevant to this matter. Following a subsequent request, DOC provided the additional footage to the undersigned on December 31, 2024. The City is still processing the new video and will be providing it to plaintiff's counsel within the next two weeks.

Consequently, plaintiff will need time to review the new materials and the parties need additional time to complete depositions and all outstanding fact discovery, and respectfully request a 60-day extension to the current deadline for completion of depositions and for the completion of all fact discovery. The current deadlines and proposed changes are as follows:

- The current deadline for the completion of all fact discovery is January 9, 2025, and therefore, the parties request an extension to March 12, 2025.
- The current deadline for the completion of all expert discovery (if any) is February 23, 2025, and therefore, the parties request an extension to April 24, 2025.
  - Plaintiff's expert disclosures are currently due January 23, 2025, and therefore, the

parties request an extension to March 26, 2025.

- Defendant's expert disclosures are currently due February 6, 2025, and therefore, the parties request an extension to April 9, 2025.
- A post-discovery joint status letter is due on January 16, 2025, and therefore, the parties request an extension to March 20, 2025.

The parties are not seeking to adjourn the Case Management Conference scheduled for March 4, 2025 at 11:00 A.M.

The parties thank the Court for its time and consideration herein.

Respectfully submitted on behalf of  
the parties,

/s/

Joseph Zangrilli  
*Senior Counsel*  
Special Federal Litigation

Cc: **VIA ECF**  
*Attorneys for Plaintiff*  
Sara Wolkensdorfer, Esq.